

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PETER M. GALLIGAN,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Case No. 1:17-cv-6310
	§	
ADTALEM GLOBAL EDUCATION, INC. F/K/A DEVRY EDUCATION GROUP;	§	Hon. Judge Joan H. Lefkow
ADTALEM GLOBAL HEALTH, INC. F/K/A DEVRY MEDICAL INTERNATIONAL, INC.; ROSS UNIVERSITY SCHOOL OF VETERINARY MEDICINE (ST. KITTS) LIMITED; and DOES 1 THROUGH 50,	§	JURY TRIAL DEMANDED
Defendants.	§	
	§	
	§	
	§	

DECLARATION OF PETER M. GALLIGAN

I, Peter M. Galligan, hereby affirm and declare as follows:

1. I am over 18 years of age, of sound mind and body, and am competent to make this Declaration. The facts stated herein are within my personal knowledge. I make this Declaration in support of Plaintiff's Motion to Transfer Venue to California and Not to St. Kitts.

2. During the summer of 2012, and while living in Burlingame, California, which is in the Northern District of California, I applied to Ross University School of Veterinary Medicine ("Ross") through its Office of Admissions located at 630 US Highway 1 North Brunswick, New Jersey 08902. I became interested in attending Ross after reading its website, viewing a recruitment seminar in the United States and being assured that the same testing accommodation of private space and more time, if needed,

that had been afforded to me throughout all four years in high school and all four years in college would continue at St. Kitts.

3. When questions arose regarding my application or the applications process, I called the toll-free U.S. phone number listed for Ross Admission Office: (855) 767-7838.

4. In early April of 2013, I was contacted by an admissions officer whom I assert was in New Jersey in Ross' Admissions Office. We discussed the debt I would have to incur to attend Ross equal to \$300,000, my academic record and passion for veterinary medicine. He responded positively to my answers and told me my application would be accepted.

5. Shortly thereafter, a large envelope arrived from New Jersey with all kinds of new student forms and other materials to be completed before school started in a few weeks' time that were to be mailed back to the Office of Admissions. Included in the large envelope was the Ross Student Handbook, which I read carefully from cover to cover.

6. Thereafter, all federal student loan applications, wired money transfers and other administrative paperwork were mailed or emailed either to, from or through Ross' offices in North Brunswick, New Jersey.

7. On May 5, 2014, my treating psychologist, Timothy C. Engelmann, Ph.D., emailed Dr. Janet Camp, head of Ross' counseling services, at jcamp@rossvet.edu.kn, with a copy to me Subject: Galligan Accomodation (sic) that requested testing accommodations to reduce my testing anxieties. For reasons unknown to me, Dr. Camp

refused Dr. Engelmann's request. I had been seeing Dr. Engelmann in Burlingame, California, where he continues his practice today.

8. Dr. Engelmann referred me to Michelle Kwok, MD, Board-certified in adult psychology and neurology, who diagnosed my issues and prescribed Klonopin and Zoloft. I had been seeing Dr. Kwok in Menlo Park, California, where she continues her practice today.

9. I would estimate that approximately 90% of my classmates at Ross were from the United States. Some, located in various States, would be available at trial to testify as to the non-accommodation of my disability during exams at Ross.

10. None of the administrative personnel responsible for or with personal knowledge of the facts relating to my dismissal remains employed by Ross. None is listed on the Ross administration or faculty website. And I am told that none is physically domiciled on the island of St. Kitts at present. A search on the Internet reveals the apparent current locations of all those involved with my case:

- Dr. Janet Camp - Former Head of Ross Counseling Services who refused Dr. Engelmann's testing accommodation request for me: King Abdullah University of Science and Technology in Thuwal, Saudi Arabia. Source: <https://www.facebook.com/janet.camp.75>;

- Dr. Elaine Watson - Former Dean of Ross to whom I appealed my case: University of Edinburgh College of Medicine and Veterinary in Edinburgh, Scotland. Source: <https://www.linkedin.com/in/elaine-watson-88663793>;

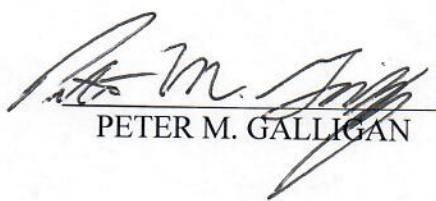
- Dr. Guy St. Jean - Former Academic and Disciplinary Dean of Ross responsible for my dismissal in retribution after I raised mass student cheating on tests in my appeal: Universite' de Montreal Centre Hospitalier Universitaire Veterinaire in Montreal, Canada. Source: https://chuv.umontreal.ca/english/dt_team/guy-st-jean; and

- Dr. Carmen Fuentealba - Former Dean of Students at Ross who had direct knowledge of and implicitly condoned rampant student cheating on tests; also refused to intervene when apprised of Dr. Camp's non-accommodation of my disability: College of Veterinary Medicine at Long Island University in Brookville, New York. Source: <https://www.zoominfo.com/p/Carmen-Fuentealba/304313531>.

11. After all of my appeals for reinstatement were refused, I appealed to Adtalem CEO Daniel Hamburger. He, too, is no longer with the company, but remains in the Chicago area as CEO of Provation Medical (Source: <https://www.linkedin.com/in/dmhamburger18>).

Under penalty of perjury under the laws of California and of the United States of America, I declare the foregoing to be true and correct.

DATED this 19th Day of February, 2020.



PETER M. GALLIGAN